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Attorneys for Defendant
CONTRA COSTA COUNTY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RETIREE SUPPORT GROUP OF CONTRA COSTA COUNTY,

Plaintiff,

v.

CONTRA COSTA COUNTY.

Defendant.

CASE NO. C 12-00944 JST

**STIPULATION REGARDING
DISCOVERY LIMITS AND CASE
DEADLINES AND ~~PROPOSED~~ ORDER**

Judge: Hon. Jon S. Tigar

WHEREAS, the parties have diligently engaged in discovery and have substantially completed document discovery;

28 WHEREAS, the parties have only taken one deposition (out of a total of, most likely, 30-

1 40) and anticipate propounding additional Interrogatories;

2 WHEREAS, Plaintiff and Defendant anticipate filing motions to compel production of
 3 documents that have been withheld on the basis of privilege after they have exhausted meet and
 4 confer efforts;

5 WHEREAS, the parties wish to continue to meet and confer on these and other discovery
 6 matters and resolve as many discovery issues as possible without Court intervention;

7 WHEREAS, the parties have reached a compromise regarding the disputed issues set forth
 8 in their most recent Joint Case Management Statement (Dkt. 91), and no longer need the Court's
 9 assistance in resolving these disputes;

10 NOW THEREFOR, the parties, by and through their respective counsel of record, hereby
 11 stipulate and agree to the following:

12 (1) Plaintiff and Defendant may each propound up to 40 interrogatories without first
 13 obtaining leave of the Court.

14 (2) Plaintiff and Defendant may each take up to 20 depositions without first obtaining
 15 leave of the Court.

16 (3) Plaintiff agrees not to pursue its objection to Defendant's temporal limitation on
 17 document production, provided Plaintiff is also not required to produce documents
 18 created after July 1, 2011, and provided Defendant agrees to produce the most recent
 19 set of Memoranda of Understanding and Salary Resolutions.

20 (4) All case deadlines will be extended as follows:

Event	Deadline
Fact discovery cut-off	1/20/15
Expert disclosures	2/23/15
Expert rebuttal	3/12/15
Expert discovery cut-off	4/9/15
Deadline to file dispositive motions	5/7/15
Pretrial conference statement due	6/22/15

1 Pretrial conference	6/30/15 at 2:00 p.m. or such other date 2 available on the Court's schedule
3 Bench trial	7/20/15 at 8:30 a.m. or such other date available on the Court's trial schedule

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5 **IT IS SO STIPULATED.**

6 DATED: June 2, 2014

7 LEWIS, FEINBERG, LEE, RENAKER &
8 JACKSON, P.C.

9 By: /s/Nina Wasow

10 NINA WASOW
11 Attorneys for Plaintiff
12 RETIREE SUPPORT GROUP OF CONTRA
13 COSTA COUNTY

14 DATED: June 2, 2014

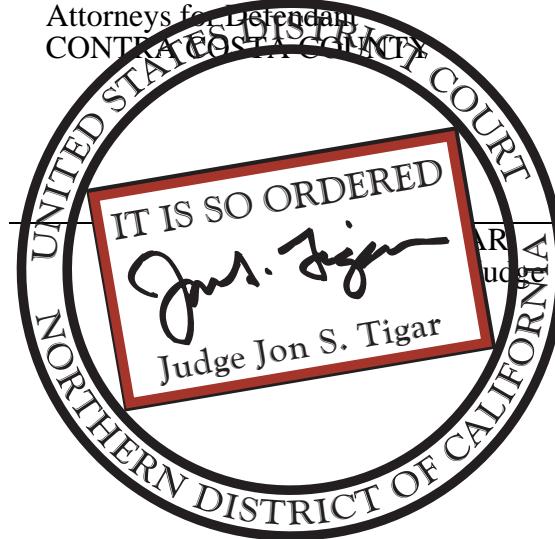
15 HANSON BRIDGETT LLP

16 By: /s/Raymond Lynch

17 RAYMOND F. LYNCH
18 Attorneys for Defendants
19 CONTRA COSTA COUNTY

20 **IT IS SO ORDERED.**

21 Dated: June 4, 2014



1 SIGNATURES UNDER GENERAL ORDER NO. 45

2 Pursuant to General Order No. 45 of the United States District Court, Northern District of
3 California, I, Nina Wasow—the ECF User whose User ID and Password are used in the filing of
4 this document—hereby attest that the concurrence to the filing of this document has been obtained
5 from each of the other signatories to this document.

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7 /s/Nina Wasow

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Nina Wasow